
From: Carter, Stacey (LDZX) <Stacey.Carter@conocophillips.com>
Sent: Tuesday, July 21, 2015 2:46 PM
To: Talton, Chuck
Cc: Shiu, Gary K (LDZX); Ellison, Stephen G. (LDZX)
Subject: ConocoPhillips Response to SBA Shipyard Superfund Site, Jennings LA
Attachments: 2015_07_21 COP Responses to EPA 104(e) Request.pdf

Mr. Talton,

Attached is a copy of ConocoPhillips Company's response to the Information Request regarding the SBA Shipyard Superfund Site. The original response has been sent to you via Certified Mail on July 21, 2015. Thank you.

Stacey Carter

Global HS&E Paralegal | ConocoPhillips Company | ML 1020 | 600 N. Dairy Ashford, Houston, TX 77079 | 281.293.1579
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July 20, 2015

Mr. Kenneth Talton, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana; CERCLIS #: LAD008434185; Information Request Pursuant to CERCLA Section 104(e), 42 U.S.C. §9604(e), Information Request

Dear Mr. Talton:

I am writing on behalf of ConocoPhillips Company and in response to the Information Request regarding the SBA Shipyard Superfund Site ("Site") received on May 22, 2015. Thank you for your courtesy in granting us an extension through July 21, 2015 to respond to the information request.

On May 1, 2012, ConocoPhillips separated into two independent publically traded companies. The "upstream" (oil and gas exploration and production) entities, assets and liabilities remained with ConocoPhillips and the "downstream" (product refining, shipping and marketing) entities, assets and liabilities were transferred to a newly created entity named Phillips 66. In addition, any and all liabilities, including any environmental liabilities, relating to, arising out of or resulting from the SBA Shipyard Superfund Site (the Site) were specifically transferred to Phillips 66 in the May 1, 2012 separation and any future correspondence regarding the Site should be directed to Phillips 66. ConocoPhillips Company has provided the Information Request to Phillips 66 and they will also respond. The "Company" for which we are responding shall mean the upstream (oil and gas exploration and production) entities, assets and liabilities that remained with ConocoPhillips after the May 1, 2012 separation.

Please direct any further communications regarding this Site to Stacey Carter, HS&E Legal Specialist, ConocoPhillips Company, ML 1020, 600 North Dairy Ashford, Houston TX 77079, Phone 281-293-1579.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Aebi".

Mark A. Aebi
Manager, Risk Management and Remediation
ConocoPhillips Company

ConocoPhillips Company
Response to May 15, 2015 Information Request
SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON PARISH, LOUISIANA

GENERAL RESPONSE

On May 1, 2012, ConocoPhillips separated into two independent publically traded companies. The “upstream” (oil and gas exploration and production) entities, assets and liabilities remained with ConocoPhillips and the “downstream” (product refining, shipping and marketing) entities, assets and liabilities were transferred to a newly created entity named Phillips 66. In addition, any and all liabilities, including any environmental liabilities, relating to, arising out of or resulting from the SBA Shipyard Superfund Site (the Site) were specifically transferred to Phillips 66 in the May 1, 2012 separation and any future correspondence regarding the Site should be directed to Phillips 66. ConocoPhillips Company has provided the Information Request to Phillips 66 and they will also respond. The “Company” for which we are responding shall mean the upstream (oil and gas exploration and production) entities, assets and liabilities that remained with ConocoPhillips after the May 1, 2012 separation.

The responses set forth herein are based on the present knowledge, information and belief of ConocoPhillips Company upstream operations. ConocoPhillips Company reserves the right to supplement these responses when and if appropriate. ConocoPhillips Company does not concede the relevancy of the responses, nor does it accept or adopt as accurate any statements or implications that may be drawn from the requests themselves. ConocoPhillips Company also reserves all objections to the forms or the requests.

These responses are not and should not be taken as an admission or waiver of any kind to the jurisdiction, statutory authority, or regularity authority of the United States Environmental Protection Agency (EPA) for this information request or any further investigation or action.

GENERAL OBJECTIONS AND COMMENTS

Based on our review of and good-faith efforts to respond timely to the Information Request, ConocoPhillips Company notes for the record that it has several objections to the form and content of the Information Request.

1. ConocoPhillips Company objects to the Information Request to the extent it is unduly burdensome and overly broad, seeks irrelevant information, is vague and unclear in its scope, requires legal conclusions to be made, and is otherwise unreasonable, thereby exceeding EPA's authority under CERCLA Section 104(e).
2. ConocoPhillips Company objects to the Information Request to the extent that it seeks information beyond the scope of EPA's authority under Section 104(e) of CERCLA. Section 104(e) authorizes EPA to request, upon reasonable notice,

information or documents relating to the following:

- a. The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- b. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- c. Information relating to the ability of a person to pay for or to perform a cleanup.

Where the questions in the request are vague, ambiguous, overbroad, unduly burdensome or beyond the scope of EPA's CERCLA Section 104(e) authority, ConocoPhillips Company has made appropriate and reasonable efforts to provide responsive information to the best of its ability to interpret the questions. Subject to and without waiving its objections, ConocoPhillips Company states that it is providing information at this time based on its review conducted in response to the specific items in the Request. In the event that ConocoPhillips Company discovers additional responsive material, it will submit such material to EPA as soon as reasonably possible.

3. ConocoPhillips Company objects to the Information Request to the extent it seeks "any and all documents" or words to that effect, as the definition of "documents" in the request is so broad that it would not be possible to assure compliance under a literal reading of this definition, and further any request for more than a defined universe of information would be unreasonably burdensome considering the zero or marginal value of any further information to EPA's investigation.
4. ConocoPhillips Company objects to the Information Request to the extent it seeks information that is legally privileged or confidential.
5. ConocoPhillips Company objects to the request to the extent it seeks documents and information that are publically available.
6. ConocoPhillips Company objects to the request to the extent it seeks documents in EPA's possession or that were in the past submitted to EPA.
7. ConocoPhillips Company objects to Definition No. 19. The Definition is overbroad and unduly burdensome because it would require ConocoPhillips to inquire and obtain information, documents, etc. from independent third parties such as "contractors," "partners," "successors," "agents," etc.
8. ConocoPhillips Company incorporates by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to

that request. Moreover, ConocoPhillips Company does not waive its right to amend its responses.

GENERAL INFORMATION CONCERNING RESPONDENT

1. Provide the full legal name and mailing address of the Respondent.

**ConocoPhillips Company
600 North Dairy Ashford
Houston, TX 77079**

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

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3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

**Gary K. Shiu
Counsel
ConocoPhillips Company
600 North Dairy Ashford, ML1016
Houston, TX 77079
281-293-1456**

4. If Respondent is a business, please give a brief description of the nature of the business.

ConocoPhillips Company is an oil and gas exploration and production company. ConocoPhillips Company explore for, produce, transport and markets crude oil, natural gas, natural gas liquids, liquefied natural gas and bitumen on a worldwide basis.

REQUESTS FOR DOCUMENTS

1. Please identify any dealings or transactions you have or had with SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred.
 - a. Specifically, provide dates of when you sent or moved something to the Site and the name and contact information of the person who made such arrangements.

Subject to and without waiving any objections, on May 1, 2012, ConocoPhillips separated into two independent publically traded companies. The “upstream” (oil and gas exploration and production) entities, assets and liabilities remained with ConocoPhillips and the “downstream” (product refining, shipping and marketing) entities, assets and liabilities were transferred to a newly created entity named Phillips 66. The “Company” for which we are responding shall mean the upstream (oil and gas exploration and production) entities, assets and liabilities that remained with ConocoPhillips after the May 1, 2012 separation. Any and all liabilities, including any environmental liabilities, relating to, arising out of or resulting from the SBA Shipyard Superfund Site (the Site) were specifically transferred to Phillips 66 in the May 1, 2012 separation. ConocoPhillips does not have responsive information for this request. To the best of our knowledge, Phillips 66 has possession of information on dealings or transactions concerning SBA Shipyards, Inc., Louis Smailhall, Suzanne Smailhall, LEEVAC Shipyards, Inc., n/k/a Bunge Street Properties, LLC, and/or LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC.

2. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 1 above.

Subject to and without waiving any objections, please see response to Request for Documents Question No. 1 above.

3. If any of the dealings or transactions described involve hazardous materials, please include a detailed listing of such materials, the materials data safety sheet, dates of transaction, and any quantity associated with those materials.

Subject to and without waiving any objections, please see response to Request for Documents Question No. 1 above.

4. Please describe in detail any involvement you had with the 2002 RCRA Interim Measures/Removal Action (IM/RA) at the Site. Please provide any and all documents in your possession related to the IM/RA, including, but not limited to, a listing of the parties involved in the IM/RA.

Subject to and without waiving any objections, please see please see response to Request for Documents Question No. 1 above.

5. Please provide the names, title, and contract information of anyone, including, but not limited to, employees, who may possess knowledge and information regarding this Site and/or your own business operations.

Subject to and without waiving any objections, please see Request for Documents Question No. 1 above.

6. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:
 - a. Each individual's job title and duties (including the dates performing those duties),
 - b. The supervisors for such duties,
 - c. The current position or the date of the individual's resignation, and
 - d. The nature of the information possessed by such individuals concerning the Respondent's waste management.
 - e. The contact information of the individual.

ConocoPhillips Company objects to the request on the grounds that it is overbroad and unduly burdensome. ConocoPhillips Company and its predecessors in interest have operated in the United States for many decades.

The request is not limited to any reasonable or relevant time period, requiring Respondent to review information and records on numerous individuals who may have had any responsibility over Respondent's environmental matters in decades of operations.

Subject to and without waiving any objections, ConocoPhillips does not have a comprehensive list of all individuals who may have or have had responsibility for ConocoPhillips Company's environmental matters. In addition, please see response to Request for Documents Question No. 1 above.

7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy (ies) of the permit(s).

Subject to and without waiving any objections, ConocoPhillips Company does not have any active permit issued under RCRA.

8. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

ConocoPhillips Company objects to this request on the grounds that it is unduly burdensome. ConocoPhillips Company and its predecessors in interest own(ed), operate(d), purchased and sold numerous facilities throughout the United States for many decades. Searching for all RCRA Identification Numbers that may have been issued to facilities owned and/or operated by ConocoPhillips Company and its predecessors in interest is unduly burdensome.

ConocoPhillips Company further objects to this request to the extent it seeks information that is publicly available or information that is in EPA's possession.

Subject to and without waiving any objections, ConocoPhillips does not maintain a comprehensive list of all RCRA Identification Numbers issued for its operations.

9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s).

ConocoPhillips Company objects to this request to the extent it seeks information that is publicly available or information that is in EPA's possession.

Subject to and without waiving any objections, ConocoPhillips separated into two independent publically traded companies on May 1, 2012. The "upstream" (oil and gas exploration and production) entities, assets and liabilities remained with ConocoPhillips and the "downstream" (product refining, pipeline and marketing) entities, assets and liabilities were transferred to a newly created entity named Phillips 66. ConocoPhillips Company has made reasonable efforts to search for responsive information to this request. To the best of our

knowledge, the upstream operations of ConocoPhillips Company have not been issued any permit(s) under the hazardous waste laws of the State of Louisiana.

10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s).

ConocoPhillips Company objects to this request on the grounds that it is unduly burdensome. ConocoPhillips Company and its predecessors in interest own(ed), operate(d), purchased and sold numerous facilities in the State of Louisiana for many years. Searching for all EPA Identification Numbers that may have been issued to facilities owned and/or operated by ConocoPhillips Company and its predecessors in interest is unduly burdensome.

ConocoPhillips Company further objects to this request to the extent it seeks information that is publicly available or information that is in EPA's possession.

Subject to and without waiving any objections, ConocoPhillips does not maintain a comprehensive list of EPA Identification Numbers supplied by the State of Louisiana.

11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

ConocoPhillips Company specifically objects to this request on the grounds that it is overbroad and unduly burdensome. ConocoPhillips Company and its predecessors in interest own(ed) and/or operate(d) numerous facilities throughout the United States for many decades; a request requiring Respondent to identify all federal, state, and local offices and agencies to which Respondent has provided any hazardous substance or hazardous waste information is overbroad and unduly burdensome.

Subject to and without waiving any objections, ConocoPhillips separated into two independent publically traded companies on May 1, 2012. The "upstream" (oil and gas exploration and production) entities, assets and liabilities remained with ConocoPhillips and the "downstream" (product refining, pipeline and marketing) entities, assets and liabilities were transferred to a newly created entity named Phillips 66. ConocoPhillips Company has made reasonable efforts to search for responsive information to this request. To the best of our knowledge, ConocoPhillips Company has provided hazardous substance or hazardous waste information to the following federal, state, and/or local agencies:

1990

New Mexico Environment Department Hazardous Waste Bureau

1992

New Mexico Environment Department Hazardous Waste Bureau

1994

New Mexico Environment Department Hazardous Waste Bureau

1997

Environmental Protection Agency, Region 10

1999

Texas Commission on Environmental Quality

2000

Environmental Protection Agency, Region 8

2002

New Mexico Environment Department Hazardous Waste Bureau

2007

Environmental Protection Agency, Region 10

2009

Environmental Protection Agency, Region 10

New Mexico Environment Department Hazardous Waste Bureau

2010

Environmental Protection Agency, Region 10

New Mexico Environment Department Hazardous Waste Bureau

California Department of Toxic Substances Control

Santa Barbara County Environmental Health Services

2011

California Department of Toxic Substances Control

Santa Barbara County Environmental Health Services

New Mexico Environment Department Hazardous Waste Bureau

2012

New Mexico Environment Department Hazardous Waste Bureau

2013

Environmental Protection Agency, Region 10

New Mexico Environment Department Hazardous Waste Bureau

California Department of Toxic Substances Control

Santa Barbara County Environmental Health Services

2014

**California Department of Toxic Substances Control
Santa Barbara County Environmental Health Services
New Mexico Environment Department Hazardous Waste Bureau**

2015

New Mexico Environment Department Hazardous Waste Bureau

12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site.

Subject to and without waiving any objections, please see response to Requests for Documents Question No. 1.

13. If barges were placed or disposed at the Site, provide the following information:
- a. Where they were placed or disposed, and
 - b. Their condition when placed or disposed.

Subject to and without waiving any objections, please see response to Requests for Documents Question No. 1

14. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.

Subject to and without waiving any objections, please see response to Requests for Documents Question No. 1.